

August 12, 2002

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission (FCC)
445 12th Street SW, TW-A325
Washington, DC 20554

Re: Ultratec's Petition on CapTel - Docket 98-67

I am sending these comments to support Ultratec's petition to the FCC requesting reimbursement of CapTel service from the interstate TRS fund.

As a person with severe binaural hearing loss, I have been participating in the Maryland CapTel trial for several months and have found the CapTel service extremely helpful. Prior to the CapTel trial, I normally used amplified telephones with my hearing aid but I would have tremendous difficulty understanding people with accents, soft speech, and/or mild or more severe speech impairments. I also had difficulty understanding parts of some voice menu systems. With CapTel, I can easily place a call to an unfamiliar person or company and utilize the text provided by the CapTel service if I cannot understand part or all of the communication.

For many calls, especially those which are critical to one's work or involving personal relationships, it is very important to be able to use one's residual hearing to pick up non-verbal information such as tone, inflection, emphasis, accents, emotion, gender, and even slurred speech. The meaning of communication can be altered tremendously by the non-verbal information, or the lack of it. I believe it is quite important for all parties to be aware that standard Voice Carry Over (VCO), which uses a single phone line, cuts off access to the sound of the other person's voice, and thus provides only partial access to the information provided in a telephone call. CapTel allows people with some residual hearing to use all of their existing capabilities to decipher such information; current VCO deprives hard of hearing people of the information that their partial hearing can access. CapTel comes much closer to providing the functional access to telephone communication which VCO should have provided all along.

CapTel still needs improvement; the text often lags considerably behind the speech. The dial-through feature, however, is a huge improvement over traditional relay services, and especially over the complicated procedures required for two line voice carry over (2LVCO). In terms of achieving the same functionality provided by 2LVCO, it is much easier to use only one telephone with CapTel in comparison with the cognitive burden of using the two pieces of telephone equipment required by 2LVCO.

Many, many people with significant hearing loss have restricted their telephone use because current relay services are not effective for them. This in turn can adversely restrict employment opportunities and one's ability to live independently. Elderly people, who have approximately a 33% chance of acquiring a hearing loss by the age of

65, also have a greater likelihood of experiencing a slowing of their cognitive processes; they need telephones and relay services which are as easy to use as possible. Many elderly people do not and may not be able to adjust to current relay services because of the cognitive overload required to do so; the inability to use a telephone can of course have severe, life and death ramifications for managing health or safety crises. Services like CapTel would be much more practical and accessible.

CapTel is not a full relay service but an improvement on the current, incomplete VCO. It would not make sense to require a technological improvement on VCO, which is one element of a relay service, to also be responsible for generating the other elements of a full relay service. It would be desirable for the FCC to make it easier for relay services to be improved and to be reimbursable if they provide the basic features of a service such as VCO. It is not clear to me why CapTel was not already reimbursable as a VCO service; it should not matter how a VCO service is provided as long as the standards for quality are met. (This line of reasoning is akin to the ADA's emphasis on employees with disabilities being able to perform the essential functions of a job: it is generally not relevant exactly **how** the mechanics of functions are performed as long as they are performed at least satisfactorily.)

I believe that CapTel will be extremely important to me and other people with hearing loss in matters of employment as well as many other life situations. I very much urge the FCC to recognize CapTel as a reimbursable TRS service.

Thank you for your attention to this very important issue.

Sincerely,

Dana Mulvany, MSW
512 Redland Blvd
Rockville, MD 20850-5703
dmulvany@usa.net